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Attorneys for Defendants
C. R. Bard, Inc. and
Bard Peripheral Vascular, Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE: Bard IVC Filters Products Liability
Litigation

No. 2:15-MD-02641-DGC

**DEFENDANTS' NOTICE OF
LODGING UNDER SEAL
CERTAIN EXHIBITS IN
SUPPORT OF BARD'S MOTION
FOR PARTIAL SUMMARY
JUDGMENT AS TO PLAINTIFF
LISA AND MARK HYDE'S
CLAIMS**

(Assigned to the Honorable David G.
Campbell)

Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively
"Bard"), pursuant to the Stipulated Protective Order (Doc. 269) and Local Civil Rule 5.6,
file this Notice of Lodging Under Seal certain exhibits attached in support of Bard's
Motion for Partial Summary Judgment as to Plaintiffs Lisa and Mark Hyde's Claims.

1 These exhibits—as well as portions of Bard’s Separate Statement of Facts that quote,
 2 reference, or characterize them (which Bard is lodging in redacted form)—contain
 3 Plaintiff’s personal healthcare information that is protected under HIPAA and confidential
 4 under the Stipulated Protective Order. Defendants have notified the plaintiffs of their
 5 intent to file this Notice of Lodging. Because the documents lodged under seal only relate
 6 to the plaintiff’s personal healthcare information, Defendants note that it is the plaintiff’s
 7 burden to file a motion to seal. A list of the Exhibits sought to be sealed, and a list of
 8 materials lodged redacted, are attached hereto as Exhibit A.

9 RESPECTFULLY SUBMITTED this 28th day of August, 2017.

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CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of August 2017, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

s/Richard B. North, Jr.
Richard B. North, Jr.

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EXHIBIT A

DOCUMENTS PROPOSED TO BE FILED UNDER SEAL

Defendants request they be permitted to file under seal the following documents in support of their Motion for Partial Summary Judgment as to Plaintiff Lisa and Mark Hyde's Claims:

Exhibit A: Excerpts of Plaintiffs' Fact Sheet

Exhibit B: Selected Medical Records of Lisa Hyde

Exhibit C: Excerpts from April 6, 2017 Deposition of Dr. David Henry

Exhibit K: Excerpts from July 24, 2017 Deposition of Dr. Derek Muehrcke

Exhibit N: Excerpts from January 25, 2017 Deposition of Lisa Hyde

Exhibit O: Excerpts from January 25, 2017 Deposition of Mark Hyde

DOCUMENTS PROPOSED TO BE LODGED REDACTED

Defendants request they be permitted to lodge redacted portions of the following documents:

Defendant's Separate Statement of Facts in Support of Motion for Partial Summary Judgment as to Plaintiffs Lisa and Mark Hyde's Claims.